

## **REMARKS**

Reconsideration of the application in view of the present amendment is respectfully requested.

With the present amendment the specification has been amended to provide appropriate headings. Claims 1 through 13 have been canceled. Claims 14-26 have been added.

Based on the foregoing amendments and the following remarks the application is deemed to be in condition for allowance and action to that end is respectfully requested.

### **I. Rejection Under 35 U.S.C. § 112**

The Examiner has rejected claims 1 through 13 under 35 U.S.C. § 112, second paragraph, for allegedly being indefinite. As noted above, claims 1 through 13 have been canceled. It is respectfully submitted that claims 14 through 26 comply with all of the requirements of 35 U.S.C. § 112.

### **II. Rejection Of Claims Over the Prior Art**

The Examiner has rejected claims 1-8 under 35 U.S.C. § 103(a) as being unpatentable over Mäenpää et al., U.S. Patent No. 5,009,996 (Mäenpää) in view of Simmonds, U.S. Patent Number 3,611,779 (Simmonds ) and Wittkopf, U.S. Publication US 2005/0000263 Wittkopf.

Claims 9-13 were rejected as being unpatentable over Mäenpää in view of Simmonds. As noted above, claims 1-13 have been canceled. It is respectfully submitted that claims 14-26 are patentable over cited references.

Specifically, claim 14 recites on an operator's side, bringing in succession, worn-out working roll sets (6) of individual rolling mill stands (2, 3, 4) by separate transversely displaceable carriages (9, 10, 11) a number of which correspond to a number of rolling mill stands, on a single connection track (14a) and advancing the worn-out working roll sets (6) with a single locomotive into a roll workshop (20). Claim 14 further recites bringing new working roll sets (6a) from the workshop (20) and depositing the new working roll sets (6a) at predetermined exchanged distances (2a, 3a, 4a) on respective transversely displaceable carriages (9, 10, 11) between the rolling mill stands (2, 3, 4) and distributing the new working roll sets (6a) between respective rolling mill stands (2, 3, 4). Still further, claim 14 recites that after unblocking of the operator's side (1b), worn-out backup roll sets (5) are moved out by the transversely displaceable carriages (9, 10, 11) after dismounting of the worn-out rolling sets (6). The worn-out backup roll sets (5) are brought by a crane in the roll workshop (21), are serviced in the workshop (20), and are transported from the workshop (20) and are mounted in corresponding rolling mill stands (2, 3, 4).

Mäenpää does not disclose or even remotely suggests bringing, in succession, worn-out working roll sets of individual rolling mill stands by separate transversely displaceable carriages a number of which corresponds to a number of rolling mill stands, on a single connection track and advancing the worn-out working roll sets with a single locomotive into a roll workshop. Nor does Mäenpää disclose bringing new working roll sets from the workshop and depositing the new working roll sets at predetermined exchanged distances on respective transversely displaceable carriages between the rolling mill stands and distributing the new working roll sets between respective rolling mill stands.

Mäenpää discloses a completely different method according to which the working rolls of each rolling mill stand are replaced individually, with the worn-out working roll set and a new working roll set being withdrawn from a respective rolling mill stand and the storage rack simultaneously (column 2, line 58 – column 3, line 15). Further, no mention of backup rolls and their replacement can be found in Mäenpää.

In view of the above, it is respectfully submitted that Mäenpää neither anticipates nor makes obvious the present invention as defined by claim 14, and claim 14 is patentable over Mäenpää.

The novel features of the present invention are also not disclosed or suggested in Simmonds and/or Wittkopf.

Firstly, it is noted that Simmonds also discusses replacement of only working rolls (column 2, lines 53-55). Further, Simmonds does not disclose the above-mentioned steps of the method according to the present invention.

Wittkopf, while disclosing use of crane for exchanging backup rolls, does not disclose any step of exchanging working rolls, as recited in claim 1.

In view of the above, it is respectfully submitted that claim 14 is patentable over the combination of Mäenpää, Simmonds, and Wittkopf assuming, *arguendo*, that they can be combined.

It is noted that the Supreme Court requires that the analysis supporting a rejection under Section 103(a) should be made explicit, and that it was “important to identify a reason that would have prompted a person of ordinary skill in the relevant field to combine the [prior art] elements (*KSR International Co. v. Teleflex Inc.*, 82 U.S.P.Q. 2d, 1385, 1389 (2007)), quoting with approval the Federal Court decision *In re Kahn*, 78 U.S.P.Q. 2d 1329, 1336 (Fed. Cir. 2006) that

“rejections on obviousness cannot be sustained with mere conclusory statements; instead, there must be some articulated reasoning with some rational underpinning to support the legal conclusion of obviousness.”

It is respectfully submitted that no articulated reasoning with rational underpinning to support the legal conclusion of obviousness has been made in the Office Action.

In view of the above, it is respectfully submitted that a *prima facie* case of obviousness of the present invention as defined by claim 14, over Mäenpää, Simmonds, and Wittkopf has not been made.

It is, therefore, respectfully submitted that claim 14 is patentable over the prior art and is allowable.

Claims 15-21 depend on claim 14 and are allowable for the same reason claim 14 is allowable and further because of specific features recited therein which, when taken alone and/or in combination with those of claim 14, are not disclosed or suggested in the prior art.

Claims 22-26 recite an installation for carrying out the method of claims 13-21, rely for their patentability on the same inventive features as claims 13-21, and are allowable for the same reasons claims 14-21 are allowable.

## CONCLUSION

In view of the foregoing, it is respectfully submitted that the application is in condition for allowance, and allowance of the application is respectfully requested.

Should the Examiner require or consider it advisable that the specification, claims and/or drawings be further amended or corrected in formal respects in order to place the case in condition for final allowance, it is respectfully requested that such amendment or correction be carried out by Examiner's Amendment and the case passed to issue. Alternatively, should the Examiner feel that a personal discussion might be helpful in advancing this case to allowance, the Examiner is invited to telephone the undersigned.

Respectfully submitted,



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